

REMARKS

This paper responds to the Office Action mailed on June 23, 2005.

Claims 1, 7, 11, 13, 17, 21, 25, 28, 33, and 40 are amended; as a result, claims 1-46 are now pending in this application.

Claim Objections

Claim 13 was objected to due to informalities. The word "than" has been amended to "then" herein, as requested by the Examiner. Therefore, this objection is overcome and should be withdrawn.

§112 Rejection of the Claims

Claims 1-46 were rejected under 35 U.S.C. § 112, first paragraph, as lacking adequate description or enablement. Although Applicant disagrees with the Examiner's assessment of the previous amendments, the amendments have been withdrawn, such that this particular rejection is no longer appropriate. Applicant notes that a data source is identified, by way of example, within the specification as a digital camera (Original Specification, page 12, first full paragraph) that includes temporary storage and the processing to invert the bits. Therefore, the claim language was supported in its original drafted form. However, these amendments have been removed and new amendments made for purposes of clarifying aspects of the invention in view of the references cited. Accordingly, the rejections are no longer appropriate and should be withdrawn. Applicant respectfully requests an indication of the same.

§102 Rejection of the Claims

Claims 1-5, 7-9, 13-18, 21, 23, and 25-27 were rejected under 35 U.S.C. § 102(e) for anticipation by de la Iglesia et al. (U.S. 6,490,703). It is of course fundamental that in order to sustain an anticipation rejection that each and every element or step in the rejected claim must be taught or suggested in the cited reference.

The Examiner has interpreted de la Iglesia as teaching the memory 306 as being the temporary storage and the memory interface 400 or the processor 304 as being the data source; the temporary storage and the data source recited in Applicant's amended independent claims.

Applicant has amended the independent claims, such that the data stream or the packet is directly received from a data source and such that the temporary storage and the processing for inversion reside within the same controller.

Neither of these recited limitations are taught or suggested in de la Iglesia where it is apparent that the inversion processing occurs in a device (memory interface 400) that is separate from the memory 306 (Examiner recited as temporary storage). Additionally, the data in de la Iglesia is not directly received into the memory 306; rather, the data first passes through an I/O interface device 114.

Accordingly, the amended independent claims now recite at least two limitations that are not taught or suggested in the de la Iglesia reference. Therefore, the rejections with respect to de la Iglesia should be withdrawn and the claims allowed. Applicant respectfully requests an indication of the same.

Claims 1-7, 9-12, 19-22, 24-26, 28-37, 39-41, and 44-46 were rejected under 35 U.S.C. § 102(b) for anticipation by Norman (U.S. 5,873,112). Again, in order to sustain an anticipation rejection each and every element or step in the rejected claim must be taught or suggested in the cited reference.

Similar to de la Iglesia, the Norman reference includes the storage (the Examiner has recited as memory cell 416 as being storage), which is separate from the controller 429. Applicant's amended independent claims now make clear and positively recite that the processing for inversion and the temporary storage both reside within the same controller. Accordingly, Norman fails to teach or suggest each and every limitation of Applicant's amended independent claims.

Accordingly, Applicant respectfully requests that the rejections with respect to Norman be withdrawn and the claims allowed, since Norman fails to teach or suggest each and every step or element of Applicant's amended independent claims.

§103 Rejection of the Claims

Claims 38, 42 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Norman in view of Goldstein (U.S. 2003/0028672). To sustain an obviousness rejection each

and every element or step in the rejected claims must be taught or suggested in the proposed combination of references.

Here, claim 38 is dependent from amended independent claim 33 and claims 42-43 are dependent from amended independent claim 40; thus, for the amendments and remarks presented above with respect to claims 33 and 40, the rejections of claims 38 and 42-43 should be withdrawn and Applicant respectfully request an indication of the same.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney Joseph P. Mehrle at 513-942-0224, or the below-signed attorney at (612) 349-9587, to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

ANTHONY MOSCHOPOULOS

By his Representatives,

SCHWEGMAN, LUNDBERG, WOESSNER & KLUTH, P.A.
P.O. Box 2938
Minneapolis, MN 55402
(612) 349-9587

Date

23 Sept '05

By

Timothy B. Clise
Reg. No. 40,957

CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 23 day of September, 2005.

Name

KACIA LEE

Signature

Kacia Lee